

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

PARADISE CRUISE LIMITED,	)	CIVIL NO. CV04-00364 ACK/BMK
	)	
Plaintiff,	)	DECLARATION OF ELISE OWENS
	)	THORN
vs.	)	
	)	
MICHAEL ELSE AND COMPANY	)	
LTD.; GREAT LAKES	)	
REINSURANCE (UK) PLC, dba	)	
TRANSMARINE; LLOYD'S OF	)	
LONDON; LLOYD'S	)	
UNDERWRITERS; ACORDIA	)	
NORTHWEST, INC.; AON RISK	)	
SERVICES, INC. OF OHIO,	)	
	)	
Defendants.	)	
	)	

DECLARATION OF ELISE OWENS THORN

ELISE OWENS THORN declares as follows:

1. I am an attorney with the law firm of Clay Chapman Crumpton Iwamura & Pulice, counsel of record for Plaintiff Paradise Cruise Limited in this action, and am licensed to practice law before all courts in the State of Hawaii.
2. I make this declaration based upon personal knowledge, am competent to testify as to the matters set forth herein, and submit the same in support of Ex Parte Motion for Leave to File Exhibit "A" to Plaintiff's Notice of

Settlement with Acordia Northwest, Inc. and Petition for Determination of Good Faith Settlement under Seal.

3. Exhibit "A" to the petition is a true and correct copy of the Agreement setting forth the terms of the settlement. Plaintiff and Acordia have agreed that the terms of the settlement are to remain confidential. For this reason, Plaintiff seeks leave of this court to file the petition with Exhibit "A" sealed, only to be reviewed by the Court and the non-settling parties identified in the petition, Defendant Aon Risk Services, Inc. of Ohio.

4. Pursuant to Section 663-15.5, the only party who is required to respond to the motion is Defendants Aon Risk Services, Inc. of Ohio.

5. Plaintiff respectfully requests that the Court grant Plaintiff's motion for leave to file Exhibit "A" under seal for the reasons set forth above.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 5<sup>th</sup> day of September, 2006, at Honolulu, Hawaii.

  
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ELISE OWENS THORN